

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA,)	
)	
v.)	
)	
CRAIG STANFORD EURY, JR.,)	Case Nos. 1:14-CR-39-1
HARRY LEE WICKER, JR., and)	1:14-CR-39-4
KENNETH W. WHITE,)	1:14-CR-39-5
)	
Defendants.)	
_____)	

**JOINT UNOPPOSED MOTION TO AUTHORIZE DEFENDANTS
TO MAKE COPIES OF GRAND JURY TRANSCRIPTS**

Defendants Craig Stanford Eury, Jr., Harry Lee Wicker, Jr., and Kenneth W. White, through counsel and without objection from counsel for the government, respectfully request an order allowing each individual defense attorney of record to produce and maintain a paper copy of each grand jury transcript provided by the government in discovery, as well as an additional paper copy for counsel for each defendant to use at trial. Counsel for the Defendants also request permission from the Court to keep the transcripts—provided by the government in electronic form—in their document management systems. In support of their Motion, the Defendants submit the following:

1. Local Criminal Rule of Procedure 6.1(b) forbids defense counsel from reproducing grand jury transcripts provided by the government during discovery.
2. The government has provided discovery primarily in electronic form, which is appropriate and efficient, but in combination with the Local Rule arguably could

prevent defense counsel from possessing even a single paper copy or from maintaining the electronic documents in their document management systems.

3. Furthermore, two of the three defendants in this matter are represented by multiple attorneys, and one has attorneys in who reside in two different cities in North Carolina. Accordingly, limiting each defendant to the single, electronic copy of a transcript provided in discovery would present significant practical difficulties to adequate trial preparation.

4. Moreover, it may become necessary for defense counsel to use the grand jury transcripts, or portions thereof, to impeach witnesses at trial. This, too, would prove practically difficult if the Defendants could not make copies of the transcripts.

5. Defense counsel recognize the necessity of maintaining the secrecy of matters that occur before the grand jury. As such, they only seek an order allowing them to create a separate paper copy of each grand jury transcript produced by the government in discovery for each attorney of record for use in trial preparation, plus one additional copy for each defendant's counsel to use at trial. They also seek leave to use their document management systems to receive transcripts produced electronically by the government.

6. Defense counsel has consulted with counsel for the government, who has no objection to this request.

Respectfully submitted, this the 2nd day of January, 2015.

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CERTIFICATE OF SERVICE

I hereby certify that, on the date below, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following:

Frank Chut, Esq.

This the 2nd day of January, 2015.

/s/ Wes J. Camden

Wes J. Camden